## REMARKS

Claims 1-10, 14-21 and 23-46 are pending in the present application. The Examiner objected to claim 1 for having a period following the word "including", and has rejected claims 1-10, 14-21 and 23-46 under 35 U.S.C. §103. Applicant has amended independent claims 1, 14, 38, 39, and 41. In particular, Applicant has amended claim 1 to correct the informality noted by the Examiner. No new matter has been added.

**Section 103 Rejections:**

Claims 1-5 and 46 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent Application Publication No. 2002/0082953 (Batham, *et al.*) in view of U.S. Patent Application Publication No. 2003/0115147 (Feldman, *et al.*) and official notice.

Claims 6 and 8-10 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, official notice, and further in view of U.S. Patent No. 5,392,066 (Fisher, *et al.*).

Claims 7 was rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, Fisher, and official notice, and further in view of U.S. Patent Application Publication No. 2002/0102966 (Lev, *et al.*).

Claims 14, 45, 17-21 and 23-37 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claims 15-16 and 43 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice, and further in view of Fisher and Lev.

Claim 38 was rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claim 39 was rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Claims 40 and 44 were rejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice, and further in view of Fisher and Lev.

Claims 41-42 were ejected under 35 U.S.C. §103(a) as being obvious over Batham, Feldman, and official notice.

Applicant respectfully disagrees with the Examiner, and urges that the methods recited in claims 1, 14, 38, 39, and 41 can be distinguished from the Examiner's references.

The Examiner cited paragraphs [36], [70], and [89] of Batham as disclosing *updating a product structure . . ., including storing new data.* However, these paragraphs disclose creating a web page that interacts with the database to display a catalog over a network, where the web page can be automatically updated when the database changes ([36]), a grid or spreadsheet into which data can be imported from a database, where data can be updated by selecting a box in the grid ([70]), and organizing user defined catalog fields in a hierarchy input by the user into a stored template ([89]). Applicant urges that none of these paragraphs disclose or suggest *updating a product structure . . .,* as essentially recited in claims 1, 14, 38, 39, and 41.

The Examiner cited paragraphs [34], [55], and [57] of Batham as disclosing *selecting views for a product wherein said views comprise a respective hierarchical structure of objects of various types.* However, paragraph [34] generally describes Batham's overall system, including a catalog builder import module that automatically retrieves data from the company database and a catalog data entry module that allows the user to manually input and/or edit data into the catalog builder module and that creates and stores an image database, paragraph [55] discloses setting up a picture oriented catalog, including a top descriptor, the picture and a bottom descriptors, and paragraph [57] discloses a catalog report setup module that provides category selection fields to organize the catalog data fields into a hierarchy. Applicant urges that none of these paragraphs disclose or suggest *selecting views for a product wherein said views comprise*

*a respective hierarchical structure of objects of various types,* as essentially recited in claims 1, 14, 38, 39, and 41.

The Examiner cited paragraphs [34], [55], [57], [66], and [89] of Batham as disclosing *updating and organizing said objects, in each case, based on said respective hierarchical structure such that said product content for all required views is stored in said catalog database.* Paragraphs [34], [55], and [57] have been described above. Paragraph [66] describes function buttons for manipulating the data in the catalog database, including buttons for adding a new record to the catalog database, deleting a record that is currently displayed in screen, copying the present record into a new record, saving the current record to the catalog database so that edits are stored, searching catalog defined fields for a specific record to display, displaying a picture associated with the present record, and advance functions such as attaching images, memo, text or document to a product category, and paragraph [89] discloses organizing user defined catalog fields in a hierarchy input by the user into a stored template. Applicant urges that none of these paragraphs disclose or suggest *updating and organizing said objects, in each case, based on said respective hierarchical structure such that said product content for all required views is stored in said catalog database,* as essentially recited in claims 1, 14, 38, 39, and 41.

The Examiner cited paragraphs [12], [55], [56], and [89] of Batham as disclosing *generating a catalog template structure in accordance with said document type definition.* Paragraph [12] discloses automatically scanning a preexisting database for the database fields and importing them into the catalog database, and catalog templates into which the catalog data is organized, so that a user can produce a catalog without performing extensive layout and graphic design. Paragraph [56] discloses a setup reports and forms module which determines which catalog database fields are linked to specific fields in a catalog template, report or form. Paragraphs [55] and [89] have been described above. Applicant urges that none of these paragraphs disclose or suggest *generating a catalog template structure in accordance with said document type definition,* as essentially recited in claims 14 and 39.

The Examiner cited paragraphs [55]-[69] as disclosing *parsing and traversing said catalog template structure.* Paragraphs [55]-[57] and [66] have been described above. The remaining paragraph describe various folders, buttons, and screens that are part of *Batham's* graphical user interface and that enable a user to perform actions or see the result of an action, such as determining which catalog database fields are displayed in detail, allowing the user to select from a fields available list and shift the selected field to a field detail list, changing the fonts, size and the colors for each of the sections of the catalog, showing the layout of the catalog and determining the location of each catalog data field that will be displayed next to each picture, selecting which style of report template is being programmed, entering data or importing data from the database, determining the layout of the catalog, defining the types of headers, footers, and/or page numbers to be used in the catalog, and associating an image with each individual product having a record in the catalog database. Applicant urges that none of these paragraphs disclose or suggest *parsing and traversing said catalog template structure,* as essentially recited in claims 14 and 39.

Regarding *evaluating, during said traversing, template objects found in said template structure as variables and catalog objects, wherein an object which is not a variable is considered a catalog object for evaluation,* the Examiner took official notice that it is well known to treat objects that are not variables as particular objects for evaluation. However, the official notice disregards the rest of this limitation, *evaluating, during said traversing, template objects found in said template structure as variables and catalog objects.*

Furthermore, none of the cited passages in Batham disclose or suggest *selecting styles for presenting hierarchical structure of objects,* or *updating and organizing said objects . . . based on said styles,* as essentially recited in amended claims 1, 14, 38, 39, and 42.

Thus, for the foregoing reasons, Applicant urges that Batham fails to disclose or suggest all of the limitations of independent claims 1, 14, 38, 39, and 41. The Examiner has cited Feldman as teaching the use of XML files based on a Document Type

Definition. Feldman is directed to an electronic content management system and discloses the use of XML to implement digital rights access for digital rights management (DRM). The Examiner has further contended that XML files are well known, that there is motivation to combine Batham and Feldman, and that the use of XML is not a patentable innovation. However, Feldman fails to rectify the deficiencies of Batham described above.

Thus, Applicant urges that since the combination of Batham and Feldman fails to teach or suggest all limitations recited by independent claims 1, 14, 38, 39 and 41, these claims are not *prima facie* obvious over Batham and Feldman, the official notice not withstanding. Reconsideration and withdrawal of these rejections are respectfully requested.

Claims 2-5, 17-21, 23-37, 42, and 45-46 all depend from claims 1, 14, 39, and 41, respectively, and are thus patentable for at least the same reasons as claims 1, 14, 39, and 41. Reconsideration and withdrawal of these rejections are respectfully requested.

Furthermore, the Examiner took official notice regarding claims 2, 14, 17, 21-23, 34, 37-39, and 42. However, for the reasons discussed above, Applicant urges that these claims are not obvious over Batham and Feldman. Reconsideration and withdrawal of these rejections are respectfully requested.

Regarding claims 6 and 8-10, the Examiner cited Fisher for teaching selectively generating and adding overlays, and combining image data and overlays. However, Fisher fails to rectify the deficiencies of Batham and Feldman, discussed above. Therefore, Applicant urges that a *prima facie* case of obviousness of claims 6 and 8-10 over Batham, Feldman, and Fisher cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.
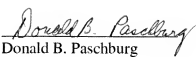
Regarding claims 7, 15-16, 40 and 43-44, the Examiner cited Lev as teaching extracting data, including labels and symbols, from images. However, Lev fails to rectify the deficiencies of Batham, Feldman and Fisher, discussed above. Therefore, Applicant urges that a *prima facie* case of obviousness of these claims over Batham, Feldman,

Fisher, and Lev cannot be maintained. Reconsideration and withdrawal of these rejections are respectfully requested.

## CONCLUSION

Applicant urges that claims 1-10, 14-21, and 23-46 are in condition for allowance for at least the reasons stated. Early and favorable action on this case is respectfully requested.

Respectfully submitted,

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